

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
24-20201-CR-WILLIAMS/GOODMAN
CASE NO. _____

18 U.S.C. § 1201(a)(1)
18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

DAVID KNEZEVICH,
a/k/a "DAVID KNEZEVIC,"
a/k/a "DUSAN KNEZEVIC,"

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

Kidnapping
18 U.S.C. § 1201(a)(1)

From on or about January 27, 2024, through on or about February 5, 2024, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

DAVID KNEZEVICH,
a/k/a "DAVID KNEZEVIC,"
a/k/a "DUSAN KNEZEVIC,"

did willfully and unlawfully seize, confine, kidnap, abduct, and carry away and hold for reward and otherwise a person, that is, the VICTIM, and did travel in foreign commerce from the United States, that is, Miami International Airport in Miami, Florida, to Madrid, Spain, in committing and in furtherance of the commission of the offense, in violation of Title 18, United States Code, Section 1201(a)(1).

FILED BY KAN D.C.

May 15, 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - Miami

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the Defendant, **DAVID KNEZEVIC, a/k/a "DAVID KNEZEVICH," a/k/a "DUSAN KNEZEVIC,"** has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1201, as alleged in this Indictment, the defendant shall forfeit to the United States: any property, real or personal, constituting or derived from any proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

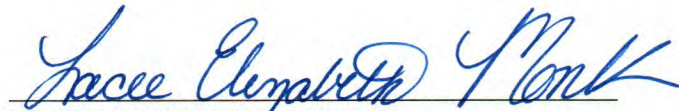
All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOR PERSON



MARKENZY LAPOINTE
UNITED STATES ATTORNEY



LACEE ELIZABETH MONK
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: _____

v.

DAVID KNEZEVICH, a/k/a "DAVID
KNEZEVIC," a/k/a "DUSAN KNEZEVIC,"

Defendant.

Court Division (select one)

- ☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

CERTIFICATE OF TRIAL ATTORNEY**Superseding Case Information:**

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of new counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 8 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I <input type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input checked="" type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) Yes
If yes, Magistrate Case No. 24-mj-02896-Reid
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of May 4, 2024
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No
15. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
16. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

By: _____

Lacey Elizabeth Monk
Lacey Elizabeth Monk

Assistant United States Attorney

FL Bar No. 100322

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: David Knezevich, a/k/a "David Knezevic," a/k/a "Dusan Knezevic"

Case No: _____

Count #: 1

Kidnapping

Title 18, United States Code, Section 1201(a)(1)

* **Max. Term of Imprisonment:** Life

* **Mandatory Min. Term of Imprisonment:** None

* **Max. Term of Supervised Release:** Five (5) years

* **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.